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October 12, 1999



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Paraplex contains Protomorphogen™ extracts which are uniquely derived nucleoprotein-mineral extracts that support cellular health.*
- (2) Bovine pancreas, adrenal, pituitary, and thyroid PMG™ extracts help maintain the healthy function of these corresponding organs and glands.*

These statements are made for a dietary supplement containing a proprietary blend of magnesium citrate, bovine pancreas PMG™ extract, dried alfalfa juice, nutritional yeast, porcine duodenum, bovine adrenal PMG™ extract, bovine pituitary PMG™ extract, bovine thyroid PMG™ extract (processed to remove its thyroxine), defatted wheat (germ), and dried buckwheat (leaf) juice. Other ingredients include calcium lactate, cellulose, and calcium stearate. And the name of the product is Paraplex®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

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